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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION,

Case No. 4:22-MD-03047-YGR

MDL No. 3047

THIS DOCUMENT RELATES TO ALL  
ACTIONS

**OMNIBUS SEALING STIPULATION  
(JOINT LETTER BRIEF REGARDING  
SNAP'S ASSERTION OF PRIVILEGE IN  
CONNECTION WITH 14 REDACTED  
DOCUMENTS)**

Judge: Honorable Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5, the Court's Order on the Stipulated Third Modified Protective Order (ECF No. 1209), and this Court's Order Setting Sealing Procedures (ECF No. 341), Plaintiffs and Defendant Snap Inc. ("Snap") submit this Omnibus Stipulation Regarding Joint Temporary Sealing Motion (ECF No. 1550) and Joint Letter Brief Regarding Snap's Assertion of Privilege in Connection with 14 Redacted Documents (ECF No. 1547).

The Parties agree that the following filings related to the Joint Letter Brief should be sealed in their entirety, and so the current sealing should be maintained:

Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
Snap's Exhibit A Bates: SNAP3160953 ECF No. 1550-3	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal ad review practices, advertising and business strategies, and relationships with advertising partners. Disclosure of this information would provide competitors with insight into Snap's business that they would not otherwise have and thereby cause competitive harm to Snap. <i>See Ctr. for Auto Safety v. Chrysler Grp., LLC</i> , 809 F.3d 1092, 1097 (9th Cir. 2016) (even under heightened compelling-reasons standard, it is appropriate to seal "business information that might harm a litigant's competitive standing" (citation omitted)); <i>In re Elec. Arts, Inc.</i> , 298 F. App'x 568, 569 (9th Cir. 2008) (sealing "confidential and	A party has not previously sought to seal the same information.

Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
			commercially sensitive information”); <i>Prescott v. Reckitt Benckiser LLC</i> , 2023 WL 2465778, at *4 (N.D. Cal. Mar. 9, 2023) (sealing “household penetration rates” and defendant’s “target consumer demographics”); <i>Cont’l Auto. Sys., Inc. v. Avanci, LLC</i> , 2019 WL 6612012, at *4 (N.D. Cal. Dec. 5, 2019) (sealing “number of customers using Plaintiff’s products”). This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.</i> , ECF Nos. 1242, 1465, 1619.	
Snap’s Exhibit B Bates: SNAP3182499 ECF No. 1550-5	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap’s internal ad review practices, advertising and business strategies, relationships with advertising partners, lens product development, and public relations strategies. Disclosure of this information would provide competitors with insight into Snap’s business that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials	A party has not previously sought to seal the same information.

Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
			related to discovery disputes on this fundamental basis. <i>See, e.g.</i> , ECF Nos. 1242, 1465, 1619.	
Snap's Exhibit C Bates: SNAP3202222 ECF No. 1550-7	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal moderation practices, lens product development, and business strategies. Disclosure of this information would provide competitors with insight into Snap's business that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.</i> , ECF Nos. 1242, 1465, 1619.	A party has not previously sought to seal the same information.
Snap's Exhibit D Bates: SNAP3245340 ECF No. 1550-9	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal moderation practices and business strategies. Disclosure of this information would provide competitors with insight into Snap's business that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted	A party has not previously sought to seal the same information.

Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
			requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.</i> , ECF Nos. 1242, 1465, 1619.	
Snap's Exhibit E Bates: SNAP3307049 ECF No. 1550-11	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's advertising and user data collection practices. Disclosure of this information would provide competitors with insight into Snap's business that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.</i> , ECF Nos. 1242, 1465, 1619.	A party has not previously sought to seal the same information.
Snap's Exhibit F Bates: SNAP5288226 ECF No. 1550-13	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal policy enforcement mechanisms, account investigation practices, and cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to	A party has not previously sought to seal the same information.

Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
			Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.,</i> ECF Nos. 1242, 1465, 1619.	
Snap's Exhibit G Bates: SNAP1141054 ECF No. 1550-15	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal investigation practices and cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.,</i> ECF Nos. 1242, 1465, 1619.	A party has not previously sought to seal the same information.
Snap's Exhibit H Bates: SNAP1157465 ECF No. 1550-17	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal investigation practices, cooperation with law enforcement investigations, and media and communications strategies. Disclosure of this information would provide competitors with insight into Snap's practices that they would	A party has not previously sought to seal the same information.

Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
			not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.,</i> ECF Nos. 1242, 1465, 1619.	
Snap's Exhibit I Bates: SNAP1151790 ECF No. 1550-19	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal account investigation and age verification practices. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.,</i> ECF Nos. 1242, 1465, 1619.	A party has not previously sought to seal the same information.
Snap's Exhibit J Bates: SNAP5288836 ECF No. 1550-21	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal account investigation and age verification practices. Disclosure of this information would provide competitors with insight into Snap's	A party has not previously sought to seal the same information.

Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
			practices that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.</i> , ECF Nos. 1242, 1465, 1619.	
Snap's Exhibit K Bates: SNAP4928443 ECF No. 1550-23	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal account investigation and age verification practices. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.</i> , ECF Nos. 1242, 1465, 1619.	A party has not previously sought to seal the same information.
Snap's Exhibit L Bates: SNAP3628554 ECF No. 1550-25	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal account investigation and age verification practices. Disclosure of this information would provide competitors with	A party has not previously sought to seal the same information.



Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
			insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.,</i> ECF Nos. 1242, 1465, 1619.	
Snap's Exhibit M Bates: SNAP3664752 ECF No. 1550-27	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal account investigations, age verification practices, and cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.,</i> ECF Nos. 1242, 1465, 1619.	A party has not previously sought to seal the same information.
Snap's Exhibit N Bates: SNAP4801937 ECF No. 1550-29	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal account investigations, age verification practices, and	A party has not previously sought to seal the

Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
			cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.,</i> ECF Nos. 1242, 1465, 1619.	same information.

The Parties agree that the following filings related to the Joint Letter Brief should be partially redacted, and so the current sealing should be modified:

Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
Joint Letter Brief ECF No. 1550-1 <sup>1</sup>	Redaction at 8 (description of Exhibit H)	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal investigation practices, cooperation with law enforcement investigations, and media and communications strategies. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and	A party has not previously sought to seal the same information.

<sup>1</sup> A redacted copy of the Joint Letter Brief was filed publicly at ECF No. 1547.

Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
			thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.</i> , ECF Nos. 1242, 1465, 1619.	

Documents without privilege redactions were never filed on the docket (and instead were lodged with the Court for in camera review). As a result, unsealing the excerpts redacted for privilege is not at issue currently. If the Court determines that any portion of the privilege redactions should be removed, Snap respectfully requests the opportunity to file a separate motion or stipulation, as appropriate, addressing whether sealing those excerpts is warranted. Snap respectfully requests 14 days to make that determination, or until February 18, 2025, whichever is later. Pursuant to this case's sealing procedures, a Proposed Order implementing this stipulation and a copy of the Joint Letter Brief with the redaction agreed by the Parties listed above are attached.

**IT IS SO STIPULATED AND AGREED.**

Dated: February 4, 2025

Respectfully submitted,

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**ATTESTATION**

I, Laura M. Lopez, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: February 4, 2025

By: /s/ Laura M. Lopez  
Laura M. Lopez